

# EXHIBIT B

(CONDITIONALLY FILED REDACTED)

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ATTORNEYS FOR ALL PLAINTIFFS

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

JANE ROE, an individual; MARY ROE,  
an individual; SUSAN ROE, an  
individual; JOHN ROE, an individual;  
BARBARA ROE, an individual;  
PHOENIX HOTEL SF, LLC, a  
California limited liability company;  
FUNKY FUN, LLC, a California limited  
liability company; and 2930 EL  
CAMINO, LLC, a California limited  
liability company,

Plaintiffs,

v.

CITY AND COUNTY OF SAN  
FRANCISCO, a California public entity,

Defendants.

Case No. 4:24-cv-01562-AMO

**DECLARATION OF JOHN ROE (A  
PSEUDONYM)**

**DECLARATION WITH TRUE NAME  
OF DECLARANT TO BE FILED  
UNDER SEAL**

**DECLARATION WITH TRUE NAME  
OF DECLARANT REDACTED TO  
BE PUBLICLY FILED**

1 I, [REDACTED], declare as follows:

2 1. I am a resident of the Tenderloin neighborhood in San Francisco and a  
3 plaintiff in the above captioned matter. I have personal knowledge of the facts set  
4 forth herein. If called as a witness, I could and would competently testify to the  
5 matters stated herein.

6 2. I am an immigrant. I was born in South America and have resided in  
7 the United States for over 15 years. I am in my late 50s. I am a behavioral health  
8 worker. About four years ago my husband and I purchased a home near the corner of  
9 Turk and Larkin Street in the Tenderloin District of San Francisco.

10 3. The conditions around my home logistically and emotionally affect and  
11 drain me. Drug deals happen around my residence at all hours. Dealers dress a  
12 specific way and obviously belong to gangs. They are intimidating. I see people on the  
13 sidewalk inject drugs. People light fires in front of my home. I hear people in the  
14 throes of drug-induced psychotic episodes screaming. The medical examiner's van  
15 recently blocked my driveway to pick up the corpse of someone who overdosed. The  
16 images below fairly and accurately depict what regular occurs outside of my home:

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4. I sometimes hears gunshots. The drug-related violence leaves me fearful and in despair. I see biological hazards and garbage everywhere on the sidewalks and streets. I recently encountered someone defecating in my doorway. When I asked that person to leave, the man threatened me.

